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12   UNITED STATES DISTRICT COURT

13   NORTHERN DISTRICT OF CALIFORNIA

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15 UNIVERSITY PROFESSIONAL AND   No. C-06-03326-SBA
    TECHNICAL EMPLOYEES, CWA
16 LOCAL 9119, AFL-CIO; RICHARD   **STIPULATION AND ORDER RE:**
    MONTOYA; CATHERINE CHAPMAN;   **CONTINUANCE OF DUE DATE FOR**
17 THOMAS MARKS; and MANUEL   **REPLIES ON PARTIES' PENDING**
    TRUJILLO,   **MOTIONS AND RE-SCHEDULING OF**
18   **CMC DATES**
              Plaintiffs/Petitioners,
19   Hearing Date: November 7, 2006
         vs.   Hearing Time: 1:00 p.m.
20   Courtroom: 3
    BOARD OF REGENTS OF THE   Judge: Hon. Saundra Brown Armstrong
21 UNIVERSITY OF CALIFORNIA; LOS
    ALAMOS NATIONAL SECURITY, LLC;   Trial date: Not yet set
22 and DOES 1 TO 40, inclusive,

23   Defendants/Respondents.

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LEGAL_US_W # 54379205.1

STIPULATION

Plaintiffs University Professional and Technical Employees, CWA Local 9119, AFL-CIO; Richard Montoya, Catherine Chapman, Thomas Marks, and Manuel Trujillo; and defendants The Regents of the University of California and Los Alamos National Security, LLC, acting through their respective counsel of record, hereby stipulate as follows:

1.   The Court currently has noticed before it for hearing on November 7, 2006, plaintiffs' motion to remand this action to state court; and defendants' assorted motions to dismiss plaintiffs' First Amended Complaint, to strike plaintiffs' demand for monetary relief, and for a more definite statement of the injunctive relief they seek. This motion originally was noticed for hearing on September 26, 2006, and after the parties requested a continuance to accommodate the schedule of counsel for defendant Los Alamos National Security, LLC, the Court re-set the hearing for November 7, 2006.

2.   In light of the continued hearing date, the parties would like additional time to prepare their replies in support of the motions. The parties propose a new due date of October 10, 2006, which would provide four weeks before the hearing for the Court to consider the replies along with the other motion papers.

3.   Also as a consequence of the continuance of the motion-hearing date to November 7, 2006, and the possible outcomes of the motion (which include a remand of this action to state court or a dismissal of this action), the parties believe there is good cause to continue the case management dates as follows so to avoid possibly unnecessary work and related expenses:

Event	Current Date	Proposed New Date
Last day for parties to meet and confer regarding initial disclosures, early settlement, ADR processes, and discovery; last day for parties to file ADR certification and either stipulation to ADR process or notice of need for ADR telephone conference	November 2, 2006	December 4, 2006
Last day for parties to complete their initial disclosures or state objections in Rule 26(f) report,	November 22, 2006	December 20, 2006

Event	Current Date	Proposed New Date
file case management statement and Rule 26(f) report		
Initial case management conference (3:00 p.m	December 6, 2006	January 8, 2007

4.   The parties therefore believe there is good cause and respectfully request that the Court approve this stipulation and reset the dates as requested.

Dated: September ___, 2006.   ARTHUR A. KRANTZ
LEONARD CARDER, LLP

By: _____
Arthur A. Krantz
Attorneys for Plaintiffs
University Professional and Technical Employees,
CWA Local 9119, AFL-CIO; Richard Montoya,
Catherine Chapman, Thomas Marks, and
Manuel Trujillo

Dated: September ___, 2006.   MARY C. OPPEDAHL
REED SMITH LLP

By: _____
Mary C. Oppedahl
Attorneys for Defendant
The Regents of the University of California

Dated: September ___, 2006.   JEFFREY D. WOHL
STEPHEN H. HARRIS
PAUL, HASTINGS, JANOFSKY & WALKER LLP

By: _____
Jeffrey D. Wohl
Attorneys for Defendant
Los Alamos National Security, LLC

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ORDER

2 On the stipulation of the parties, and good cause appearing therefor,

3 IT IS ORDERED that the replies in support of the motion of plaintiffs University Professional

4 and Technical Employees, CWA Local 9119, AFL-CIO; Richard Montoya, Catherine Chapman,

5 Thomas Marks, and Manuel Trujillo to remand this action to state court and the respective motions of

6 defendant The Regents of the University of California and Los Alamos National Security, LLC, to

7 dismiss plaintiffs' plaintiffs' First Amended Complaint, to strike their demand for monetary relief, and

8 for a more definite statement of the injunctive relief they seek may be filed by October 10, 2006.

9 IT IS FURTHER ORDERED that the case management dates will be reset as follows:

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Event	Current Date	Proposed New Date
Last day for parties to meet and confer regarding initial disclosures, early settlement, ADR processes, and discovery; last day for parties to file ADR certification and either stipulation to ADR process or notice of need for ADR telephone conference	November 2, 2006	December 4, 2006
Last day for parties to complete their initial disclosures or state objections in Rule 26(f) report, file case management statement and Rule 26(f) report	November 22, 2006	December 20, 2006
Initial case management conference (3:00 p.m.) via telephone. Plaintiff's Counsel shall initiate the conference call and call the Court with all parties on the line at (510)637-3559.	December 6, 2006	January 10, 2007

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24 Dated: September 15, 2006.   _____

25   Saundra Brown Armstrong

26   United States District Judge

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STIPULATION, ORDER RE: HEARING DATE
U.S.D.C, N.D. Cal, No. C-06-03326-SBA